

The Honorable Ronald B. Leighton

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT TACOMA**

ADRIENNE BENSON and MARY  
SIMONSON, individually and on behalf of all  
others similarly situated,

*Plaintiffs,*

v.

DOUBLE DOWN INTERACTIVE, LLC, a  
Washington limited liability company, and  
INTERNATIONAL GAME TECHNOLOGY,  
a Nevada corporation,

*Defendants.*

Case No. 18-cv-00525-RBL

**DECLARATION OF TODD LOGAN**

1 Pursuant to 28 U.S.C. § 1746, I declare and state as follows:

2 1. I am an attorney at Edelson PC. I am entering this declaration in support of  
3 Plaintiffs' Motion to Compel Re: Request for Production No. 4.

4 2. This declaration is based upon my personal knowledge unless otherwise  
5 indicated. If called upon to testify as to the matters stated herein, I could and would competently  
6 do so.

7 3. Attached hereto as Exhibit 1 is a true and accurate copy of Plaintiffs' First Set of  
8 Requests for Production to DoubleDown Interactive, LLC.

9 4. Virtual chip transaction data was produced in *Fife v. Scientific Games Corp.*, No.  
10 18-cv-00565-RBL (W.D. Wash.) and *Wilson v. Playtika Ltd. et al.*, No. 18-cv-05277-RBL (W.D.  
11 Wash.) without any motion practice by the defendants in those matters or by Apple Inc., Google  
12 LLC, and Facebook, Inc. (the "Platforms").

13 5. On June 9, 2020, my colleague Brandt Silver-Korn offered via email to withdraw  
14 the subpoenas issued to the Platforms, which are accessible at Dkt. 102-1, if DoubleDown agreed  
15 to complete document production responsive to Plaintiffs' Request for Production No. 4 by July  
16 15, 2020. On June 12, 2020, DoubleDown, through its counsel Jaime Drozd Allen, rejected  
17 Plaintiffs' offer via email.

18 6. Attached hereto as Exhibit 2 is a true and accurate copy of Defendant  
19 DoubleDown Interactive, LLC's Objections and Responses to Plaintiffs' First Set of Requests  
20 for Production.

21 7. On July 14, 2020, I sent an email to counsel for DoubleDown, Jaime Drozd Allen,  
22 offering to narrow the scope of Request for Production No. 4 to exclusively encompass the app  
23 DoubleDown Casino, if DoubleDown agreed to produce all responsive transactional data for the  
24 putative class by July 31, 2020.

25 8. On July 15, 2020, I met and conferred telephonically, and in good faith, with  
26 counsel for DoubleDown. The purpose of the call was to attempt to resolve the Parties' dispute  
27 over Plaintiffs' Request for Production No. 4 without court action. The other conference

1 participants were Brandt Silver-Korn, Cecily Shiel, Jaime Drozd Allen, Cyrus Ansari, and  
2 Benjamin Robbins.

3 9. During the July 15, 2020 call, counsel for DoubleDown, Jaime Drozd Allen,  
4 stated that DoubleDown objected to Request for Production No. 4 because transactional data for  
5 the putative class was not relevant or proportional at this stage of the case. Ms. Allen agreed that  
6 the Parties' dispute over RFP No. 4 would require the Court's intervention.

7  
8 I declare under penalty of perjury that the above and foregoing is true and correct.

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10 Executed on this 16th day of July, 2020 at San Francisco, California.

11 /s/ Todd Logan  
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